

DRAFT

July 19, 2011

Richard Eberhart Hall, AICP
Maryland Secretary of Planning
Maryland Department of Planning
301 West Preston Street, Suite 1101
Baltimore, MD, 21201

Dear Secretary Hall:

Re: Comments on the Draft PlanMaryland

Thank you for the opportunity to comment on the Draft PlanMaryland. We appreciate the substantial amount of work that has been put into the Draft Plan and look forward to working with you to achieve its key goals and objectives of seeking to balance future growth pressures, and ensuring a sustainable and high quality of life for residents, by concentrating development and redevelopment in places where there is existing and planned infrastructure.

The City of Rockville is the county seat of Montgomery County and is located in the center of the key I-270/MD Route 355 growth corridor. It has long been recognized, by the County, the State and even nationally, as a dynamic city that offers an excellent quality of life to its citizens, while embracing new residents and business who have been attracted to the areas robust economy. The City has anticipated future growth in its Comprehensive Master Plan and, in 2008, by the adoption of a new zoning ordinance that rezoned single-use commercial and office/laboratory zones into mixed use zones. Indeed, our Municipal Growth Element (MGE), adopted in 2010 in compliance with State law, states that:

“Areas for growth in Rockville are virtually all infill locations, where projects will involve redevelopment of previously developed sites. At present, these areas are overwhelmingly single-use commercial or single-use office/laboratory spaces, where the zoning and market are likely to support mixed-use development...In general, growth will be concentrated along the MD Route 355 and I-270 corridors, with individual sites as exceptions in other locations throughout the City.” (Page 23, City of Rockville Municipal Growth Element, 2010)

The City takes pride in being one of the lead jurisdictions in Maryland to develop transportation policies, including a Complete Streets Policy and the Transportation Demand Management Plan, which support the same goals as PlanMaryland. The City’s current work on the *Rockville’s Pike* Plan, meets the first and third PlanMaryland goals by supporting the concentration of growth and

development around metro stations and encouraging multi-modal transportation systems by providing and upgrading facilities for bicyclists, pedestrians and transit users. City staff has been coordinating this effort with both Montgomery County and the Maryland Department of Transportation, as we have on Regional Smart Growth projects such as the Corridor Cities Transitway (CCT) and the Bus Rapid Transit (BRT) study.

Noting our history of growth and redevelopment, and our location in the heart of Montgomery County, we were surprised to learn that the PlanMaryland recommendations for initial GrowthPrint areas within the City are only those areas identified – by indistinct spots – as Transit Oriented Development areas near the Twinbrook and Shady Grove Metro Stations. This extremely limited view of potential growth areas in Rockville appears to stem from the process discussed in the PlanMaryland document, which focuses first on areas designated by existing State programs and then offers the possibility of expanding the growth areas beyond these initial areas. The City of Rockville believes that this approach and process is problematic for Rockville and, likely, for other jurisdictions.

Rockville believes that PlanMaryland should use, for its initial GrowthPrint areas, the growth areas designated in each jurisdiction's State-required Municipal Growth Element (MGE). Rockville worked hard to comply with the requirements of the MGE and amended its Comprehensive Master Plan accordingly. The PlanMaryland process would require that Rockville repeat a process that was just completed last year, and was accepted by the Maryland Department of Planning.

We have limited our current comments to those areas within our municipal boundaries. However, we do maintain an interest in development activity within our Maximum Expansion Limits (MEL) and support the inclusion of the sites adjacent to our municipal boundary, but under Montgomery County jurisdiction, that might be identified as GrowthPrint areas.

We suggest that MDP make the following amendments:

- The City's adopted MGE has identified areas as locations for future growth, as noted above, and these should be identified as GrowthPrint areas within our PFA. The vast majority of the growth areas are proximate to existing infrastructure, including the important MD 355 State highway and Rockville Town Center.
- Rockville is fortunate to have a significantly higher number of historic properties that have received National Register designation than has been noted by PlanMaryland, and we suggest that these should also be included in PlanMaryland.
- The Transit Oriented Development areas should be mapped with greater specificity to ensure that only those sites that are targeted for growth are included. The current large red spots do not separate out the areas recommended for higher intensity uses from the areas – such as single family, townhome and multi-family residential neighborhoods – that should be maintained and improved, but not redeveloped. The City has no plans to change these residential neighborhoods and recommends that the Transit Oriented Development designation should be applied only to those areas that are in the process of, or are proposed for, redevelopment, both inside and outside the City's municipal boundaries.

Richard Eberhart Hall, AICP
Maryland Secretary of Planning
Page 3

A map illustrating our recommendations is attached.

We look forward to working with you to effect these modifications to PlanMaryland in advance of the document being forwarded to the Governor.

Yours truly,

Phyllis Marcuccio
Mayor

John Britton
Councilmember

Piotr Gajewski
Councilmember

Bridget Donnell Newton
Councilmember

Mark Pierzchala
Councilmember

Attachment – Map Illustrating City of Rockville Growth Print recommendations.

Cc: MNCPPC
Montgomery County Executive
Montgomery County Council
City of Rockville Planning Commission
Scott Ullery, City Manager
Susan Swift, Director, CPDS
Craig Simoneau, Director of Public Works
Burton Hall, Director of Recreation and Parks
Andrew Gunning, Assistant Director, CPDS
David B. Levy, Chief of Long Range Planning
Ann Wallas, Planner III